

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Docket No. 20-mj-04237-DHH
)	
)	
VINCENT KIEJZO)	

DEFENDANT'S MOTION FOR DETENTION HEARING

Now comes the Defendant, through undersigned counsel, who respectfully requests that the Court hold a hearing concerning the issue of detention. Mr. Kiejzo had previously agreed to a voluntary order of detention in this case on September 11, 2020, and an order of detention was issued without prejudice.

Since that time, the Defendant has provided documentation to the government and to the Probation Department related to issues of detention, and proposes that the residence to which he seeks to be released and specific conditions of release can ameliorate any concerns the Court may have about pretrial release in this case.

Mr. Keijzo asks that this be scheduled as soon as practicable for the Court.

Respectfully submitted,
VINCENT KIEJZO
By His Attorney,

/s/ Sandra Gant
Sandra Gant, B.B.O.# 680122
Federal Public Defender Office
51 Sleeper Street, 5th Floor
Boston, MA 02210
Tel: 617-223-8061

CERTIFICATE OF SERVICE

I, Sandra Gant, hereby certify that this document filed through the ECF system will be sent electronically to the registered participant(s) as identified on the Notice of Electronic Filing (NEF) on September 28, 2020.

/s/ Sandra Gant

Sandra Gant